

STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0123803; AI 155577; PER20080001** to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

- I. THE APPLICANT IS:** Central Gulf Services, LLC
Gonzales Facility
P.O. Box 820
Gonzales, LA 70737
- II. PREPARED BY:** Angela Marse
- DATE PREPARED:** June 13, 2008
- III. PERMIT ACTION:** LPDES permit LA0123803, AI 155577; PER20080001
- LPDES application received: January 15, 2008
- LPDES permit issued: none issued

IV. FACILITY INFORMATION:

A. The application is for the discharge of treated wastewater, washwater, and stormwater runoff from a centralized waste treatment facility serving local industries. The facility will accept wastewaters consisting of non-hazardous line flush waters from petroleum and chemical processing; rinse waters from tanks and containers last containing oil, petroleum-related materials and RCRA non-regulated materials; non-hazardous rinse waters from cleaning industrial structures, impoundments, and pads; and stormwater collected from industrial dikes, sumps, and secondary collection systems. Wastewaters accepted from treatment may include oily wastewater, used oil, off-specification crude, hydraulic fluid, and diesel.

B. The facility is located at 3143 South Burnside Avenue in Gonzales, Ascension Parish.

C. Central Gulf Services recovers oil from oily wastewater, used oil, off-spec crude, hydraulic fluid, and diesel. The treatment facility consists of an oil/water separator, a dissolved air flotation (DAF) unit to remove solids, and a Lamella thickener to remove finer solids. Treated wastewater will be reused in the truck wash facility and retreated or discharged into a unnamed drainage canal. Solids removed from the DAF and Lamella units will be belt pressed and put in drums or a dewatering box. Solids will then be properly disposed in a permitted solid waste facility.

E. Outfall 001

| | | |
|---------------------|-----------|-------------------|
| Discharge Location: | Latitude | 30° 12' 13" North |
| | Longitude | 90° 55' 25" West |

Description: treated oily wastewater

Design Capacity: 0.15 MGD

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Type of Flow Measurement which the facility plans to use: totalizing flow meter

V. RECEIVING WATERS:

The discharge is into an unnamed drainage canal, thence into Boyle Bayou, thence into Bayou Conway, thence into Blind River in segment 040403 of the Lake Pontchartrain Basin. This segment is listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 040403 of the Lake Pontchartrain Basin are as indicated in the table below^{1/}:

| Overall Degree of Support for Segment 040403 | Degree of Support of Each Use | | | | | | |
|--|-------------------------------|------------------------------|--------------------------------|------------------------------------|-----------------------|------------------------|-------------|
| | Primary Contact Recreation | Secondary Contact Recreation | Propagation of Fish & Wildlife | Outstanding Natural Resource Water | Drinking Water Supply | Shell fish Propagation | Agriculture |
| Partial | Full | Full | Not Supported | Not Supported | N/A | N/A | N/A |

^{1/}The designated uses and degree of support for Segment 040403 of the Lake Pontchartrain Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

Section 303 (d) of the Clean Water Act as amended by the Water Quality Act of 1987, and EPA's regulations at 40 CFR 130 require that each state identify those waters within its boundaries not meeting water quality standards. The Clean Water Act further requires states to implement plans to address impairments. LDEQ is developing Total Maximum Daily Loadings Studies (TMDLs) to address impaired waterbodies. Segment 040403 of the Lake Pontchartrain Basin is on the 2006 Integrated 303(d) List of Impaired Waterbodies. The suspected causes of impairment are mercury, nitrate/nitrite, dissolved oxygen, phosphorus, sedimentation, turbidity, and non-native aquatic plants. To date no TMDLs have been completed for this waterbody.

Until completion of the TMDLs for the Lake Pontchartrain Basin, suspected causes of impairment which are not directly attributed to this type of point source have been eliminated in the formulation of effluent limitations and other requirements of this permit. This includes sedimentation, nutrients, dissolved oxygen, turbidity, and non-native aquatic plants. This determination is made through best professional judgment.

Suspected causes of concern remaining after the elimination process are addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

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Mercury

The source of mercury has been identified as atmospheric deposition. The proposed discharge is approximately fifteen miles from the mercury impaired waterbody. A mercury limit is required by the Effluent Guidelines for Centralized Waste Treatment Facilities and is included in the permit. Should the TMDL for mercury determine a more stringent mercury effluent limitation is necessary; a reopener clause has been included in the draft permit.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 040403 of the Lake Ponchartrain Basin, is listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish & Wildlife Service (FWS) as habitat for the *West Indian Manatee* which is listed as a threatened/endangered species. This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). A copy of the draft permit has been submitted to the FWS for review.

VII. HISTORIC SITES:

The discharge will be from a new facility. LDEQ has consulted with the State Historic Preservation Officer (SHPO) in a letter dated April 14, 2008 to determine whether construction-related activities could potentially affect sites or properties on or eligible for listing on the National Register of Historic Places. SHPO's response, dated May 5, 2008 stated that the facility as proposed will have no potential effects.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mrs. Angela Marse
Water Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

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IX. PROPOSED PERMIT LIMITS:**Final Effluent Limits:****OUTFALL 001**

There are two processes at Central Gulf Services, LLC; 1.) treatment of oily wastewater (including used oil, off-spec crude, hydraulic fluid, and diesel) generated off-site and 2.) truck washing. Treatment of oily wastewater would make Central Gulf Services, LLC a centralized waste treatment facility as per EPA's guidelines for centralized waste treatment facilities found at 40 CFR Part 437. The regulations say a centralized waste treatment (CWT) facility means any facility that treats (for disposal, recycling or recovery of material) any hazardous or non-hazardous industrial wastes, hazardous or non-hazardous industrial wastewater, and/or used material received from off-site. Central Gulf Services, LLC does not own the trucks transporting the waste or discharge volumes large enough to be regulated by EPA's Transportation and Equipment Cleaning Guidelines. Similar facilities have been issued effluent limits based on LDEQ's Barge Cleaners' Guidance Document (TKO Services, Inc., LA0101567, Port Marine, LA0105040) for truck and equipment washing. Finally, the discharge is into a drainage canal, thence into Boyle Bayou. Due to limited stream flow and nature of the discharge, water quality limits were derived for the guideline parameters with state water quality criteria (in this case, metals). A water quality spreadsheet compared the technology based effluent limits for centralized waste treatment facilities to the water quality limits based on water quality factors. Where the water quality based limit was more stringent than the technology based, the water quality based limit applies. Therefore, proposed limits will be based on LDEQ's Barge Cleaner's Guidance Document for Petroleum Products, EPA Guidelines for Centralized Waste Treatment Facilities, and water quality based limits.

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

| Effluent Characteristic | Monthly Avg. | Daily Max. | Basis |
|--------------------------------|---------------------|-------------------|--|
| TSS | 30.6 mg/l | 74.1 mg/l | 40 CFR Part 437 Subpart B. Effluent limitations attainable by the application of best practicable control technology for centralized waste treatment facility that treat and recover oil from waste and/or wastewater. |
| COD | 250 mg/l | 400 mg/l | BPJ based on truck washing operations. LDEQ's Barge Cleaner's Guidance Document for Petroleum Products and Inorganic Chemicals. |
| Oil and grease | --- | 15 mg/l | BPJ based on truck washing operations. LDEQ's Barge Cleaner's Guidance Document for Petroleum Products and Inorganic Chemicals. |
| Arsenic* | 0.343 | .815 mg/l | Water Quality Based Limit. See Appendix B-1. |
| Cadmium | 0.0102 mg/l | 0.0172 mg/l | 40 CFR Part 437 Subpart B. Effluent limitations attainable by the application of best practicable control technology for centralized waste treatment facility that treat and recover oil from waste and/or wastewater. |

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| Effluent Characteristic | Monthly Avg. | Daily Max. | Basis |
|------------------------------|--------------|-------------|---|
| Cobalt | 18.8 mg/l | 56.4 mg/l | 40 CFR Part 437 Subpart B. Effluent limitations attainable by the application of best practicable control technology for centralized waste treatment facility that treat and recover oil from waste and /or wastewater. |
| Copper* | 0.058 mg/l | 0.139 mg/l | Water Quality Based Limit. See Appendix B-1. |
| Lead* | 0.088 | 0.209 mg/l | Water Quality Based Limit. See Appendix B-1. |
| Mercury* | 0.0001 mg/l | 0.0003 mg/l | Water Quality Based Limit. See Appendix B-1. |
| Tin | 0.165 mg/l | 0.335 mg/l | 40 CFR Part 437 Subpart B. Effluent limitations attainable by the application of best practicable control technology for centralized waste treatment facility that treat and recover oil from waste and /or wastewater. |
| Zinc* | 0.401 mg/l | 0.953 mg/l | Water Quality Based Limit. See Appendix B-1. |
| Bis (2-ethylhexyl) phthalate | 0.101 mg/l | 0.215 mg/l | 40 CFR Part 437 Subpart B. Effluent limitations attainable by the application of best practicable control technology for centralized waste treatment facility that treat and recover oil from waste and /or wastewater. |
| Butylbenzyl phthalate | 0.0887 mg/l | 0.188 mg/l | 40 CFR Part 437 Subpart B. Effluent limitations attainable by the application of best practicable control technology for centralized waste treatment facility that treat and recover oil from waste and /or wastewater. |
| Carbazole | 0.276 mg/l | 0.598 mg/l | 40 CFR Part 437 Subpart B. Effluent limitations attainable by the application of best practicable control technology for centralized waste treatment facility that treat and recover oil from waste and /or wastewater. |
| n-Decane | 0.437 mg/l | 0.948 mg/l | 40 CFR Part 437 Subpart B. Effluent limitations attainable by the application of best practicable control technology for centralized waste treatment facility that treat and recover oil from waste and /or wastewater. |
| Fluoranthene | 0.0268 mg/l | 0.0537 mg/l | 40 CFR Part 437 Subpart B. Effluent limitations attainable by the application of best practicable control technology for centralized waste treatment facility that treat and recover oil from waste and /or wastewater. |

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| Effluent Characteristic | Monthly Avg. | Daily Max. | Basis |
|-------------------------------------|--------------|-------------------------|---|
| n-Octadecane | 0.302 mg/l | 0.589 mg/l | 40 CFR Part 437 Subpart B. Effluent limitations attainable by the application of best practicable control technology for centralized waste treatment facility that treat and recover oil from waste and /or wastewater. |
| Total Phenol | --- | 0.5 mg/l | BPJ based on truck washing operations. LDEQ's Barge Cleaner's Guidance Document for Petroleum Products and Inorganic Chemicals. |
| Benzene | --- | 0.3 mg/l ^{1,2} | BPJ based on truck washing operations. LDEQ's Barge Cleaner's Guidance Document for Petroleum Products and Inorganic Chemicals. |
| Toluene | --- | 0.3 mg/l ^{1,2} | BPJ based on truck washing operations. LDEQ's Barge Cleaner's Guidance Document for Petroleum Products and Inorganic Chemicals. |
| Total xylene | --- | 0.3 mg/l ^{1,2} | BPJ based on truck washing operations. LDEQ's Barge Cleaner's Guidance Document for Petroleum Products and Inorganic Chemicals. |
| Ethylbenzene | --- | 0.3 mg/l ^{1,2} | BPJ based on truck washing operations. LDEQ's Barge Cleaner's Guidance Document for Petroleum Products and Inorganic Chemicals. |
| Naphthalene | --- | 0.3 mg/l ^{1,2} | BPJ based on truck washing operations. LDEQ's Barge Cleaner's Guidance Document for Petroleum Products and Inorganic Chemicals. |
| Bromodichloro-methane ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| Carbon Tetrachloride ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| Chloroform ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| Dibromochloro-methane ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| 1,2-Dichloro-ethane ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| 1,1-Dichloro-ethylene ³ | --- | 0.05 mg/l | WQBL. BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| 1,3-Dichloro-propylene ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |

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| Effluent Characteristic | Monthly Avg. | Daily Max. | Basis |
|---|--------------|------------|--|
| Methyl Chloride ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| Methylene Chloride ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| 1,1,2,2-Tetra-chloroethane ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| Tetrachloro-ethylene ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| 1,1,1-Trichloro-ethane ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| 1,1,2-Trichloro-ethane ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| Trichloro-ethylene ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |
| Vinyl Chloride ³ | --- | 0.1 mg/l | BPJ based on the facility's potential to accept chlorinated organic compounds for treatment. |

¹ If any individual analytical test result is less than the minimum quantification level (MQL) listed in Part II, Section A, Paragraph 13 of the permit, a value of zero (0) may be used for that individual result for the Discharge Monitoring Report (DMR) calculations and reporting requirements.

² All effluent characteristics shall be sampled simultaneously. The sum of the highest three (3) effluent characteristics in any one sampling shall not exceed 0.3 mg/l (Daily Maximum). If a grab sample is collected on any one day, the results shall not exceed the Daily Maximum value. Report individual component results and total of highest three components.

³ These parameters must be monitored only during months in which the outfall could potentially be affected by the acceptance of wastestreams containing chlorinated organic compounds and once a month for two months thereafter. If the effluent limitation is exceeded during either of these two additional months, then monitoring shall continue once per month until the limit is met for two consecutive months at which time monitoring for the specified parameter shall cease.

Other Effluent Limitations:**1) pH**

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.)

2) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

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X. PREVIOUS PERMITS:

LPDES Permit No. LA0123803: none issued

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:**A) Inspections**

This is a proposed facility. No inspections have been performed for this facility.

B) Compliance and/or Administrative Orders

This is a proposed facility. No enforcement actions have been administered for this facility.

C) DMR Review

This is a proposed facility. No DMRs have been submitted for this facility.

XII. ADDITIONAL INFORMATION:

The Louisiana Department of Environmental Quality (LDEQ) reserves the right to impose more stringent discharge limitations and /or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDLs. The LDEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to establish TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

In accordance with LAC 33:IX.2903, this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b)(2)(c) and (D); 304(b)(2); and 307(a)(2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

- a) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- b) Controls any pollutant not limited in the permit; or
- c) Requires reassessment due to change in 303(d) status of waterbody; or
- d) Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit for Outfall 001 are standard for facilities with daily flow between 0.1 and 0.5 MGD.

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XIII. TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in this Statement of Basis.

XIV. REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 2006.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2008.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2008.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Central Gulf Services, LLC, SOCHEM SOLUTIONS, Gonzales Facility, January 15, 2008.